

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**CHARLES EDWARD STEED,**  
**on behalf of himself and all others**  
**similarly situated, and**  
**AMY SUMMERS, on behalf of**  
**herself and all others similarly**  
**situated**

**Plaintiffs,**

**v.**

**EQUIFAX INFORMATION**  
**SERVICES, LLC**

**Defendant.**

**CIVIL ACTION**

**NO. 1:14-cv-00437-SCJ-CMS**

**DISCOVERY STIPULATION  
CONCERNING ADVICE OF COUNSEL**

WHEREAS the above-captioned parties seek to resolve their current dispute regarding certain discovery on any advice of counsel that Equifax Information Services LLC (Equifax) may have received or relied upon, and

WHEREAS the parties seek to conserve judicial resources and unnecessary motion practice, they now stipulate as follows:

1. Neither Troy Kubes nor Julie Shirley, nor any representative from Equifax's legal department, will offer any evidence in this matter;

2. Equifax will not assert any advice of counsel defense with respect to any aspect of this matter; which will be understood to mean that Equifax will not argue, urge, imply, or suggest that the Court or jury should consider whether its policies or practices were reviewed, approved, condoned, or sanctioned by any

lawyer or legal department or that any such policies or practices went into effect or continued in effect as a result of any consultation, advice, or opinion provided by any lawyer or legal department in adjudicating any aspect of this matter, including (but not limited to) summary judgment, class certification, or trial;

3. Plaintiffs will not, in any aspect of this matter (including, but not limited to) summary judgment, class certification, or trial, argue, urge, imply, or suggest that Equifax did not have any lawyer or legal department review, approve, condone, or sanction its policies or that any such policies or practices went into effect or continued in effect without any consultation, advice, or opinion provided by any lawyer or legal department; and

4. Plaintiffs will not seek any discovery related to communications between Equifax and any lawyer or legal department.

**AGREED** and **STIPULATED** to by the parties:

Dated: September 2, 2015

/s/ John Soumilas  
John Soumilas  
FRANCIS & MAILMAN, P.C.  
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*Attorney for Plaintiffs*

/s/ Meryl W. Roper  
Meryl W. Roper  
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*Attorney for Defendant*

**SO ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2015

\_\_\_\_\_  
Hon. Catherine M. Salinas, U.S.M.J.